

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
MARGARET W. LAMBROSE  
3 Assistant Federal Public Defender  
Nevada State Bar No. 11626  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577/Phone  
(702) 388-6261/Fax  
6 Maggie\_lambrose@fd.org

7 Attorney for Keshawn Cox

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 KESHAWN COX,

15 Defendant.

Case No. 2:18-CR-00102-RFB-NJK

**STIPULATION TO CONTINUE  
MOTION DEADLINES**  
(First Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United  
18 States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the United  
19 States of America, and Rene L. Valladares, Federal Public Defender, and Margaret W.  
20 Lambrose, Assistant Federal Public Defender, counsel for Keshawn Cox, that the pretrial  
21 motion deadline be continued two weeks.

22 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
23 shall have to and including July 9, 2018, to file any and all pretrial motions and notice of  
24 defense, currently due June 25, 2018.  
25  
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1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
2 shall have to and including July 23, 2018, to file any and all responsive pleadings, currently due  
3 July 8, 2018.

4 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
5 shall have to and including July 30, 2018, to file any and all replies to dispositive motions,  
6 currently due July 9, 2018.

7 1. On June 22, 2018, the government disclosed two CDs of additional discovery in  
8 this matter. Thus, defense counsel needs additional time to conduct investigation in this case  
9 in order to determine whether there are any pretrial issues that must be litigated and whether  
10 the case will ultimately go to trial or will be resolved through negotiations.

11 2. The defendant is incarcerated and does not object to the continuance.

12 3. The parties agree to the continuance.

13 4. The additional time requested herein is not sought for purposes of delay, but  
14 merely to allow counsel for defendant sufficient time within which to be able to effectively and  
15 complete investigation of the discovery materials provided.

16 5. Additionally, denial of this request for continuance could result in a miscarriage  
17 of justice.

18 This is the first stipulation to continue filed herein.

19 DATED this 25th day of June, 2018.

20 RENE L. VALLADARES  
21 Federal Public Defender

DAYLE ELIESON  
United States Attorney

22 By /s/ Margaret W. Lambrose  
23 MARGARET W. LAMBROSE  
24 Assistant Federal Public Defender

By /s/ Robert Knief  
ROBERT KNIEF  
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3  
4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 KESHAWN COX,

8 Defendant.

Case No. 2:18-CR-00102-RFB-NJK

FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER

9  
10 FINDINGS OF FACT

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
12 Court finds that:

13 1. On June 22, 2018, the government disclosed two CDs of additional discovery in  
14 this matter. Thus, defense counsel needs additional time to conduct investigation in this case  
15 in order to determine whether there are any pretrial issues that must be litigated and whether  
16 the case will ultimately go to trial or will be resolved through negotiations.

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21 complete investigation of the discovery materials provided.

22 5. Additionally, denial of this request for continuance could result in a miscarriage  
23 of justice.

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IT IS FURTHER ORDERED that the parties shall have to and including July 23, 2018 to file any all responses.

DATED this 27th day of June, 2018.

RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE